

AFFIDAVIT

I, Aaron Riley, being duly sworn, state under oath that:

1. I am a detective with the Kansas City, Missouri Police Department (KCMOPD) and have been employed by KCMOPD since January of 2009. I have been a detective within the police department since September of 2015, conducting investigations involving drug law violations and firearms offenses within the Kansas City metropolitan area. I am currently assigned to the Illegal Firearms Squad.

2. During my tenure with the police department, I have been involved in numerous investigations of various individuals in the importation and distribution of controlled substances and investigations of illegal firearm possession. I have communicated extensively with other state and federal law enforcement personnel who specialize in drug and firearm investigations. I have also had experience in interviewing suspects, debriefing defendants, participating witnesses, informants, and other persons who have had personal experience and knowledge of weapon's law violations.

3. This Affidavit contains information necessary to support probable cause for this application. It is not intended to include every fact or matter observed by me or known by law enforcement. The information provided is based on my personal knowledge and observation during the course of this investigation, information conveyed to me by other law enforcement officials and others, and my review of records, documents, and other physical evidence obtained during the investigation.

4. On October 13, 2018, at approximately 09:48 p.m., officers with KCMOPD were conducting patrol in the area of Linwood Boulevard and Cleveland Avenue in Kansas City, Jackson County, Missouri, within the Western District of Missouri. An officer observed a white Buick Le Sabre automobile, bearing Missouri license plate SP9B1X, traveling at a high rate of speed eastbound on Linwood Boulevard from Cleveland Avenue. A computer check to the license plate of the vehicle revealed it to belong to a Chevrolet automobile, not the Buick automobile to which it was currently affixed. The officer activated his emergency lights and siren in an attempt to conduct a traffic stop on the vehicle. The vehicle began to pick up speed and refused to stop.

5. The vehicle went eastbound on 31st Street and crossed over into the opposite lanes of traffic, going eastbound in the westbound lanes. The vehicle turned southbound on Emmanuel Cleaver II Boulevard from 31st Street. The officer stopped pursuing the vehicle but kept a visual on the vehicle as it continued to elude. The vehicle struck several curbs while making turns causing the front passenger's side tire to blow out.

6. The vehicle came to a complete stop at 33rd Street and Kensington Avenue. The same officer observed an unknown black male, later identified as **Reginald Abbott, date of birth 08/11/1979**, exit the driver's side of the vehicle and begin to flee on foot, running eastbound on 33rd Street. The officer began pursuing **Abbott** on foot, giving several voice commands to stop, but **Abbott** refused to stop. The officer finally caught up to **Abbott**, took **Abbott** into custody, and placed him under arrest at the intersection of 33rd and Cypress streets.

7. A tow was ordered for the white Buick Le Sabre, **Abbott** had abandoned. Upon inventory of the vehicle, the officer found a Smith and Wesson .40 caliber semi-automatic handgun, Serial Number FX2U015027, lying on the driver's side floorboard. The handgun was loaded with one (1) live .40 caliber round of ammunition in the chamber and fourteen (14) additional live rounds of .40 caliber ammunition in the magazine. A spent .40 caliber shell casing was located in the back seat of the vehicle. Located lying in the driver's seat of the vehicle was a white powder substance weighing approximately 13.72 grams. It appeared to be a controlled substance, likely cocaine.

8. A computer check revealed **Abbott** to be on federal supervision from an ammunition possession case (14-CR-00235-01-W-BP) and a convicted felon prohibiting him from possessing firearms. **Abbott** was placed under arrest on an investigative hold for illegal possession of a firearm.

9. On April 17, 2018, at 7:21 p.m., Abbott waived his *Miranda* rights and agreed to speak about his arrest. **Abbott** admitted to fleeing from the police and possession of the white powder substance. **Abbott** denied ownership of the Smith and Wesson handgun, but had knowledge of it. **Abbott** further stated his DNA would be on the Smith and Wesson handgun because he had handled it. **Abbott** claimed the gun belonged to someone else that had been in the vehicle with him, yet the officer never saw anyone in the vehicle other than **Abbott** and no one exited the vehicle other than **Abbott**.


10. A Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), trained as an interstate nexus expert for the ATF, stated the recovered Smith and Wesson, .40 caliber handgun had not been manufactured or produced within the State of Missouri and therefore has previously traveled in interstate or foreign commerce before it was seized in this case.

11. A review of **Abbott's** criminal history revealed multiple felony convictions for various offenses, to include:

- a. On June 27, 1998, in Jackson County Missouri, Criminal Case CR199803852, **Abbott** was found guilty of Armed Criminal Action and 2nd Degree Murder.
- b. On January 1, 2018, in Jackson County Missouri, Criminal Case 1416CR0305501, **Abbott** was found guilty of Voluntary Manslaughter and Armed Criminal Action.

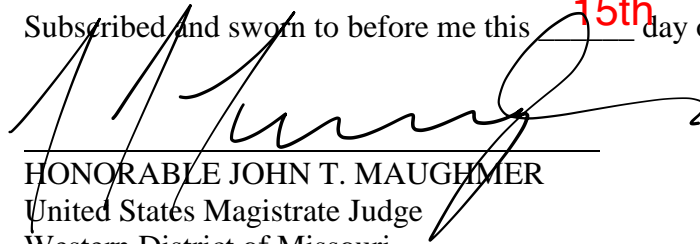
- c. On September 3, 2015, in the Western District of Missouri, **Abbott** was found guilty of illegally possessing firearm ammunition.

FURTHER, AFFIANT SAYETH NAUGHT.



Aaron Riley, Detective
Kansas City, Missouri Police Department
Illegal Firearms Squad

Subscribed and sworn to before me this 15th day of October, 2018.



HONORABLE JOHN T. MAUGHMER
United States Magistrate Judge
Western District of Missouri